

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

HAAS OUTDOORS, INC.

Plaintiff,

v.

DRYSHOD INTERNATIONAL, LLC,  
AND JAMES K. DONOHUE

Defendants.

§  
§  
§  
§  
§  
§  
§  
§  
§  
§

C.A. NO. 1:18-cv-00978-RP  
[LEAD CASE]

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DRYSHOD INTERNATIONAL, LLC,  
AND JAMES K. DONOHUE

Plaintiffs,

v.

HAAS OUTDOORS, INC.,

Defendant.

§  
§  
§  
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§  
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§  
§

C.A. NO. 1:18-cv-00596-RP  
[CONSOLIDATED]

**PLAINTIFF'S NOTICE TO THE COURT**

**EXHIBIT A**

**Plaintiff's Proposed Stipulated Facts**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

HAAS OUTDOORS, INC.	§	
	§	
Plaintiff,	§	C.A. NO. 1:18-cv-00978-RP
	§	[LEAD CASE]
v.	§	
	§	
DRYSHOD INTERNATIONAL, LLC, AND JAMES K. DONOHUE	§	
	§	
Defendants.	§	

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DRYSHOD INTERNATIONAL, LLC, AND JAMES K. DONOHUE	§	
	§	
Plaintiffs,	§	C.A. NO. 1:18-cv-00596-RP
	§	[CONSOLIDATED]
v.	§	
	§	
HAAS OUTDOORS, INC.,	§	
	§	
Defendant.	§	

**PLAINTIFF’S PROPOSED STIPULATED FACTS**

Pursuant to Local Rule CV-16(f)(3) and the Court’s June 30, 2021 Order (Dkt. #257), Plaintiff Haas Outdoors, Inc. (“Haas Outdoors”), refers to the previous filing of stipulations (Dkt. #212). Haas Outdoors further states that the parties continue to negotiate a stipulation as to quantities of products at issue and other stipulates which would abbreviate the number of exhibits introduced by the parties.

Dated: September 30, 2021.

Respectfully submitted,

HAAS OUTDOORS, INC.

By Its Attorneys,  
JONES WALKER LLP

By: s/ W. Whitaker Rayner  
W. WHITAKER RAYNER

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